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REMARKS

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Applicant respectfully requests reconsideration and allowance of the subject application. Claims 1-12, 15-17, 23-37, and 39-40 are canceled without prejudice. New claims 49-60 are added. Claims 13, 14, 18-22, 38, and 41-60 are pending in this application.

Examiner Interview

The undersigned wishes to thank Examiner Fowlkes for his time during a telephonic interview that was conducted on Feb. 20, 2007. During the interview, Allan Sponseller and Examiner Fowlkes discussed the Selkirk reference and the pending claims. Proposed claim amendments were discussed to incorporate the elements of dependent claim 15 into independent claim 13 and to further clarify the language of claim 13. These amendments have been included in this response. No agreement as to the allowability of the claims was reached.

Information Disclosure Statement

An Information Disclosure Statement and accompanying form PTO-1449 citing one reference was filed June 9, 2005. However, an initialed copy of the form PTO-1449 has not yet been received. Applicant respectfully requests that an initialed copy of this form PTO-1449 be returned.

35 U.S.C. § 102

Claims 13-22 and 38-48 stand rejected under 35 U.S.C. §102(e) as being unpatentable over "SchemaCoder" by Selkirk, (hereinafter "Selkirk"). Claims 15-

17 and 39-40 have been canceled without prejudice, thereby rendering the rejection of claims 15-17 and 39-40 moot. Applicant respectfully submits that claims 13, 14, 18-22, 38, and 41-48 are not anticipated by Selkirk.

With respect to amended claim 13, amended claim 13 recites:

> One or more computer readable media having stored thereon a plurality of instructions that, when executed by a transformation engine, causes the transformation engine to:
> access a plurality of constructs in an application programming interface description, wherein the description is written in an extensible markup language (XML) format; and
> transform each of the plurality of constructs into computer executable instructions and declarations for a component object module (COM) application programming interface header file, wherein to transform one or more of the plurality of constructs is to:
> > check an attribute of a declare enumeration construct of the plurality of constructs to determine whether the declare enumeration construct is to be transformed into a series of manifest constants or into a component object model enumeration declaration; and
> > transform the declare enumeration construct into the component object model enumeration declaration if the attribute has a first value, and otherwise transform the declare enumeration construct into the series of manifest constants.

Applicant respectfully submits that no such computer readable media is disclosed in Selkirk.

Selkirk mentions that the SchemaCoder takes a schema using the W3C XML-Schema standard, validates it, and if successful, creates C++ code (see, p. 17, lines 10-11). However, the simple mention of validating a schema or creating C++ code does not provide any disclosure or suggestion to check whether a declare enumeration construct is to be transformed into a series of manifest constants or into a component object model enumeration declaration, much less to check an attribute of the declare enumeration construct itself to determine whether

the declare enumeration construct is to be transformed into a series of manifest constants or into a component object model enumeration declaration. Validation of a schema generally refers to validating that the schema conforms to the standard. Applicant respectfully submits that simply mentioning validating a schema does not include any mention or discussion of making a determination of which of two different ways to transform a declare enumeration construct. Without such a mention or discussion, Applicant respectfully submits that Selkirk cannot disclose to transform the declare enumeration construct into the component object model enumeration declaration if the attribute has a first value, and otherwise transform the declare enumeration construct into the series of manifest constants as recited in amended claim 13. For at least these reasons, Applicant respectfully submits that amended claim 13 is allowable over Selkirk.

With respect to claims 14, 18-22, and 48, given that claims 14, 18-22, and 48 depend from amended claim 13, Applicant respectfully submits that claims 14, 18-22, and 48 are likewise allowable over Selkirk for at least the reasons discussed above.

With respect to amended claim 38, Applicant respectfully submits that, similar to the discussion above regarding amended claim 13, Selkirk does not disclose a plurality of construct fields include one or more declare enumeration construct fields, and wherein each declare enumeration construct field includes: a plurality of declare enumeration member constructs, and an enumeration flag attribute that is set to a first value to indicate that the plurality of declare enumeration member constructs are to be transformed into a series of manifest constants, and that is set to a second value to indicate that the plurality of declare

enumeration member constructs are to be transformed into a component object model enumeration declaration as recited in amended claim 38. For at least these reasons, Applicant respectfully submits that amended claim 38 is allowable over Selkirk.

With respect to claims 41-47, given that claims 41-47 depend from amended claim 38, Applicant respectfully submits that claims 41-47 are likewise allowable over Selkirk for at least the reasons discussed above.

Applicant respectfully requests that the §102 rejections be withdrawn.

New Claims

New claims 49-60 are added. Applicant respectfully submits that new claims 49 and 55 are allowable over Selkirk for at least the same reasons as discussed above with respect to amended claim 13. With respect to claims 50-54 and 56-60, given that claims 50-54 depend from claim 49 and claims 56-60 depend from claim 55, Applicant respectfully submits that claims 50-54 and 56-60 are likewise allowable over Selkirk for at least the reasons discussed above.

Conclusion

All of the claims are in condition for allowance. Accordingly, Applicant requests that the Office issue a Notice of Allowability. If the Office's next anticipated action is to be anything other than issuance of a Notice of Allowability, Applicant respectfully requests a telephone call for the purpose of scheduling an interview.

Respectfully Submitted,

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